

**THE GENIE COMPANY**  
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TO: The Commission  
FROM: Larry Murphy – Director of Engineering  
SUBJECT: ET Docket 01-278  
DATE: 8 February 2002

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As the Director of Engineering for The Genie Company, I would like to submit our comments to the Commission's proposals as described in ET Docket 01-278. The Genie Company is a well known and respected supplier of residential and commercial door operators for close to 50 years. While millions of homeowners domestically rely on the proven reliability of our product as a convenience item, countless businesses, elderly and handicap persons depend upon the full operation of the device, including the remote controls, to function on a day to day basis to maintain their lifestyle.

The petition put forth by SAVI Technology, Inc. has the potential to result in an unacceptable level of interference that could render our remote control system for both past and future product useless. It is our understanding that the transmission power and duration of devices covered under FCC Part 15 are limited in an effort to maximize the device's utility while minimizing its potential for interference. By allowing the RFID devices proposed by SAVI to transmit for 120 seconds then go silent for 10 seconds virtually creates a continuous signal that could reduce the effective range of our transmitters to a level that would make them unacceptable. SAVI indicates that this technology would be confined to "commercial areas," where many of our products are also installed and relied upon for safety and security. Also, with the support of companies like UPS, it is a logical conclusion that these devices will end up in delivery trucks that routinely travel residential areas. Homeowners in these neighborhoods could find their remote controls inoperable for two minutes without an identifiable cause. And since the RFID device is only required to be silent for ten seconds, the homeowner would have a ten second window in which to gain access to their home.

Therefore, it is our request that the Commission deny SAVI's petition and preserve the integrity of the unlicensed spectrum for both existing and future use. It is by denying this petition that the FCC would best serve the public interest.

Sincerely,

Larry D. Murphy  
Director of Engineering  
The Genie Company